



JOINT STATE OFFICE

January 17, 2017

The Honorable Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Revised Proposed SLCP Strategy and Revised Draft Environmental Analysis

Dear Chair Nichols,

The California Refuse Recycling Council (CRRC) is a trade association comprised of over 100 refuse and recycling companies across the state committed to superior management of waste resources, including composting, anaerobic digestion and renewable energy production.

We support the reduction of short-lived climate pollutants, as outlined in the Revised Proposed SLCP Strategy. CRRC members are already working to reduce California's methane emissions. We have been active participants in the progress of SB 1383 and are currently developing specific recommendations to support state diversion goals in organics management.

We appreciate the inclusion of language around financial incentives to encourage the development of necessary organic infrastructure and to foster markets, as well as the need to collaborate among agencies to overcome barriers. This is a critical issue for our industry, as new and old regulations must be consistent in supporting overarching goals. Reducing regulatory barriers to the siting of organics recycling facilities, for example, is fundamental to 75% diversion and organics infrastructure development. Meanwhile, efforts like the Healthy Soils Initiative and SB 1383 development need to be synchronized to build off our resources and move forward collectively.

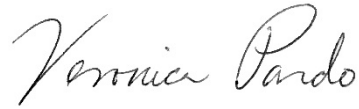
We applaud the interagency efforts of the AB 1045 working group to evaluate and resolve existing constraints in the planning, siting, and permitting process. However, this process requires the inclusion of local government, regional water boards and the local air districts. Ultimately, siting and permitting occur at the local level, and only through dedicated coordination will we resolve the barriers facing infrastructure development in organics management.

We thank you for the opportunity to submit these comments and look forward to supporting a finalized SLCP Strategy.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kathryn Lynch".

Kathryn Lynch
Regulatory Affairs

A handwritten signature in cursive script, appearing to read "Veronica Pardo".

Veronica Pardo
Regulatory Affairs

cc: CRRRC State Executive Committee Members